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U.S. District Court  
Eastern District of MI  
Detroit

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

-----X  
ISAAC THOMAS,

*Plaintiff,*

Case #: 25-10524

Hon. Michelson

v.

GENESEE COUNTY SHERIFF'S DEPARTMENT,  
MICHEAL TOCARCHICK, and  
CHRIS SWANSON,

*Defendants.*

-----X  
**PLAINTIFF'S MOTION TO REQUEST COURT-APPOINTED COUNSEL AND  
SPONSORSHIP OF OUT-OF-STATE ATTORNEY PRO HAC VICE**

NOW COMES Plaintiff Isaac Thomas, proceeding pro se, respectfully moving this Honorable Court to appoint counsel under 28 U.S.C. § 1915(e)(1) and to facilitate the sponsorship of his retained out-of-state attorney, Steven Metcalf of Metcalf & Metcalf, P.C., under the Court's pro hac vice admission procedures. In support of this motion, Plaintiff states the following:

1. Plaintiff is pursuing this civil rights action involving complex constitutional claims under 42 U.S.C. § 1983 against the Genesee County Sheriff's Department, Michael Tocarchick, and Chris Swanson for their refusal to take Plaintiff's rape report and alleged efforts to cover up an investigation into a foster care placement.
2. Plaintiff has secured the support of attorney Steven A. Metcalf II of Metcalf & Metcalf, P.C., a licensed attorney based in New York City, to assist in this case. However, Mr. Metcalf is not licensed to practice law in the state of Michigan, or in this federal jurisdiction. Mr. Metcalf is admitted in various federal jurisdictions throughout

New York, and in the District Court for Washington, D.C. If local counsel were to come on this matter, I am confident that Mr. Metcalf's assistance will be impactful for me in litigating this matter.

3. As a prerequisite for Mr. Metcalf to be able to commit to represent me in this case – Mr. Metcalf requires sponsorship by an attorney licensed to practice in Michigan for pro hac vice admission pursuant to Local Rule 83.20(c) of the United States District Court for the Eastern District of Michigan.

4. Plaintiff respectfully requests that this Honorable Court appoint counsel licensed in Michigan, not only to represent Plaintiff but also to sponsor Mr. Metcalf's pro hac vice admission, thereby enabling Mr. Metcalf to participate fully in Plaintiff's representation.

5. Given the prior relationship Plaintiff has built with Mr. Metcalf in the course of various matters, the complexity of the legal issues involved, and Plaintiff's lack of formal legal training, Plaintiff believes that the assistance of qualified counsel in the instant relief requested is essential for the fair and effective presentation of his claims.

6. This request is made in good faith and not for the purposes of delay. Defendants have yet to even be served yet, so they will not be prejudiced by this request.

WHEREFORE, in light of the above in conjunction with the commencement of this case pro se, Plaintiff respectfully requests that this Honorable Court:

1. Appoint an attorney licensed in Michigan to represent Plaintiff under 28 U.S.C. § 1915(e)(1);

2. Instruct the appointed Michigan attorney to sponsor the pro hac vice admission of Steven Metcalf of Metcalf & Metcalf, P.C.; and
3. Grant any other relief the Court deems just and appropriate.

Dated: February 24, 2025

Respectfully submitted,



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*Pro Se Plaintiff*

This motion was done by A.I.  
Even if the court ~~can't~~ appoint full counsel,  
it would be nice if an attorney could,  
at least be appointed to help me file  
my motions. Thank you for considering.